

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

SUSAN M. BARTH-ANDREWS, and HAROLD  
ANDREWS, her spouse,

Plaintiff,

v.

JOHNSON & JOHNSON, JOHNSON & JOHNSON  
CONSUMER INC., IMERYS TALC AMERICA,  
INC., and PERSONAL CARE PRODUCTS  
COUNCIL,

Defendants.

MDL No. 2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN

COMPLAINT AND JURY DEMAND

Civil Action No: \_\_\_\_\_

DIRECT FILED ACTION

**NOTICE OF FILING**

Notice is hereby given pursuant to Case Management Order No. 3 (Filing of Short Form Complaints) that a Short Form Complaint and Jury Demand was filed in the above-referenced case on November 30, 2017 on behalf of Susan M. Barth-Andrews and Harold Andrews, her spouse.

Dated: November 30, 2017

Respectfully submitted:



MICHAEL GOETZ, ESQUIRE  
Florida Bar No. 963984  
Morgan & Morgan  
Complex Litigation Group  
One Tampa City Center, 7<sup>th</sup> Floor  
201 N. Franklin Street  
Tampa, Florida 33602  
Telephone (813) 223-5505  
Facsimile (813) 223-5402  
E-Mail: [MGoetz@forthepeople.com](mailto:MGoetz@forthepeople.com)  
Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all parties of record via the District of New Jersey electronic filing system on December 1, 2017.

/s/ Michael Goetz  
Attorney for Plaintiffs